

AO 88A (Rev. 12/20) Subpoena to Testify at a Deposition in a Civil Action

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

MARK FLORA

Plaintiff

v.

TRANSOCEAN DRILLING  
(USA), INC., ET AL.

Defendant

Civil Action No. 4:19-CV-2328

## SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

Smith Maritime, Inc.

c/o Its Registered Agent, Corporation Service Company 1201 Hayes Street, Tallahassee, Florida, 32301

(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Place: Smith Maritime, Inc. c/o Its Registered Agent, Corporation Service Company 1201 Hayes Street, Tallahassee, Florida, 32301	Date and Time: 01/31/2022 10:00 am
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The deposition will be recorded by this method: WRITTEN QUESTIONS

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: Any and all personnel records from 01/01/2021 to present, including, but not limited to, accident/injury reports, medical records, employment records, applications, references, training manuals, training completed, awards, reprimands, evaluations, disciplinary records, insurance records, benefits and workers' compensation records, as well as, any and all payroll records, including, but not limited to, all records/documents reflecting wages earned, W-2 forms and/or 1099 forms, and time sheets

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(c) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 01/13/2022

CLERK OF COURT

OR

s/b Michael D. Williams

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Defendant  
Grand Isle Shipyard, LLC, who issues or requests this subpoena, are:

Michael D. Williams, Brown Sims, P.C., 1177 West Loop South, 10th Floor, Houston, Texas, 77027  
713-629-1580 (P), 713-629-5027 (F), Email: mwilliams@brownsims.com

## Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT

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